

1 Fei Fei Fan  
 2 10420 Queens Blvd Apt 20R  
 3 Forest Hills, NY 11375  
 4 (404) 432-4868  
 5 litmus9@msn.com  
 6 feifei.fan@hotmail.com  
 7 *Pro Se*

8 **IN THE UNITED STATES DISTRICT COURT**  
 9 **IN AND FOR THE DISTRICT OF NEVADA**

10 FEI FEI FAN,  
 11 Plaintiff,  
 12 vs.  
 13 State of Nevada Ex Rel. Board of Regents  
 14 of the Nevada System of Higher  
 15 Education, On Behalf of the University of  
 16 Nevada, Reno  
 17 Defendant.

Case No.: 3:24-cv-00427-MMD-CLB

**NOTICE OF CYBERATTACK ON  
 PLAINTIFF'S LITIGATION PLATFORM  
 AND IMPACT ON COURT  
 COMMUNICATIONS**

18 Plaintiff respectfully notifies the Court that on the evening of April 17, 2025, her private  
 19 litigation platform—used to store evidence and track filings—came under a sustained and  
 20 coordinated cyberattack. The site is non-public and registered under the same email address  
 21 Plaintiff designated for PACER registration and communications in this case.

22 As a result, Plaintiff's litigation inbox began receiving a high volume of system-generated  
 23 alerts, which may continue to disrupt her ability to reliably access time-sensitive communications  
 24 in this matter. The attacks remain ongoing.

25 The intrusion has diverted Plaintiff's time from litigation tasks, including the preparation  
 26 and review of discovery requests and answers, and motion-related filings. These conditions have  
 27 interfered with Plaintiff's ability to prosecute this case effectively and protect her procedural rights.

28 Although Plaintiff does not presently identify the actor responsible, the timing and nature  
 of the intrusion raise serious concern. The attack occurred within hours of Plaintiff's filing of ECF  
 No. 47, which objected to structural irregularities. That filing followed ECF No. 46, which  
 expressly reserved Plaintiff's right to assert future claims under the Trafficking Victims Protection  
 Reauthorization Act (TVPRA), Title IX, and the False Claims Act (FCA).

1 This Notice is submitted to preserve the procedural record and respectfully place the Court  
2 on notice of continuing interference with Plaintiff's litigation capacity. Plaintiff reserves all rights  
3 to seek protective or corrective relief under Rules 26 and 37 of the Federal Rules of Civil Procedure,  
4 Rule 60(b)(6), and the Due Process Clause, as warranted.

5  
6 Respectfully submitted,

7 Dated: April 18, 2025

*Fei Fei Fan.*

8 Fei Fei Fan

9 *Pro Se*  
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15 Education, On Behalf of the University of  
16 Nevada, Reno  
17 Defendant.

18 **CERTIFICATE OF SERVICE**

19 I, Fei Fei Fan, certify that on April 18, 2025, I served the following document(s):

- 20 • NOTICE OF CYBERATTACK ON PLAINTIFF'S LITIGATION PLATFORM  
21 AND IMPACT ON COURT COMMUNICATIONS

22 on the following individuals by Electronic Filing (via CM/ECF system) indicated:

- 23 1. **Frank Z LaForge** (Defendant's Attorney).

24 I declare under penalty of perjury under the laws of the United States that the foregoing  
25 is true and correct.

26 Respectfully submitted,

27 Dated: April 18, 2025

*Fei fei Fan.*

Fei Fei Fan

*Pro Se*